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Form to used by a prisoner filing a civil rights complaint under

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THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

APR 14 2014

TONY R. MOORE, CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA  
BY BW

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT COURT

Randell Orange #447630

Full Name of Plaintiff, Prisoner Number

2:14-cv-0806 Sec P

Civil Action No. \_\_\_\_\_

GEO GROUP INC

James Leblanc, Secretary of D.O.C

Warden Terry Terrell, et al

Full Name of Defendant(s)

COMPLAINT

I. Previous Lawsuits

A. Have you begun any other lawsuit while incarcerated or detained in a facility?

Yes ☒ No ☐

B. If your answer to the proceeding question is yes, provide the following information.

1. State the court(s) where each lawsuit was filed (if federal, identify the district, if state court, identify the county or parish):

At your court, Western District of Louisiana

300 Fanning St, Shreveport, LA 71101

2. Name the parties to the previous lawsuit(s):

Plaintiffs: Randell Orange

Defendant(s) James Leblanc, Secretary of D.O.C, et al

3. Docket number(s): 12-CV-2889

4. Date(s) on which each lawsuit was filed: 11-10-12

5. Disposition and date thereof [for example, was the case dismissed and when? Was it appealed and by whom (plaintiff or defendant)? Is the case still pending?]

Still in progress! The Defendants prolonging  
asking for Extension of time. The Summary  
Judgment been filed, waiting on a ruling.

C. Have you filed any lawsuit or appeal in any federal court or appeal, which has been dismissed?

Yes \_\_\_\_\_ No ☒

If your answer to the proceeding question is yes, state the court(s) which dismissed the case, the civil action number(s), and the reason for dismissal (e.g., frivolity, malice, failure to state a claim, defendants immune from relief sought, etc.).

\_\_\_\_\_  
\_\_\_\_\_

II. A. Name of institution and address of current place of confinement:

Allen Correctional Center, Kinder, Louisiana 3751 Lauderdale Woodland Rd

B. Is there a ~~prison~~ grievance procedure in the institution?

Yes ☒ No \_\_\_\_\_

1. Did you file an administrative grievance based upon the same facts, which form the basis of this lawsuit?

Yes ☒ No \_\_\_\_\_

If yes, what is the Administrative Remedy Procedure number? ALC-2013-653

2. If you did not file an administrative grievance, explain why you have not done so.

\_\_\_\_\_  
\_\_\_\_\_

3. If you filed an administrative grievance, answer the following question.

What specific steps of the prison procedure did you take and what was the result? (For example, for state prisoners in custody of the Department of Public Safety and Corrections: did you appeal any adverse decision through all steps of the administrative grievance procedure by appealing to the Secretary of Louisiana Department of Public Safety and Corrections? For federal prisoners: did you appeal any adverse decision from the warden to the Regional Director for the Federal Bureau of Prisons, or did you make a claim under the Federal Tort Claims Act?)

I wrote the Warden, They did a investigation, I filed

my ARP. Everything on file on on camera. They still didn't do nothing.  
 Attach a copy of each prison response and/or decision rendered in the administrative proceeding.

### III. Parties to Current Lawsuit:

- A. Name of Plaintiff RANDALL ORANGE (447630)  
 Address 3751 Lauderdale Woodyard Rd, Kinder, LA 70648
- B. Defendant, GEO GROUP INC  
 Address 1 PARK PLACE, Suite 700, 621 NW. 53<sup>RD</sup> ST  
 BOCA RATON, FLA 33487
- C. Defendant, JAMES LEBLANC, SECRETARY OF D.O.C  
 Address P.O. Box 94304, Capitol Station, Baton Rouge, LA 70804
- D. Defendant, TERRY TERRELL, WARDEN AT ALLEN  
 Address 3751 LAUDERDALE WOODYARD RD, KINDER, LA 70648

Additional defendants TERRY LANEY, CAPTAIN / GARRETT, CAPTAIN /  
 GREG WISE, CAPTAIN / MR. RUSSELL, SGT / MR. LAY JAY, Lt.  
 MR. COOK, SGT / MR. WINDOW, SGT / MR. ESTES, WARDEN / MR. CASTALLO, Lt.


### IV. Statement of Claims

State the facts of your case. Specifically describe the involvement and actions of each named defendant. Include the names of all persons involved in the incident(s) or condition(s) giving rise to the lawsuit, and the dates upon which and the places where the incident(s) and/or condition(s) occurred. YOU ARE REQUIRED TO SET FORTH ONLY FACTUAL ALLEGATIONS; YOU ARE NOT REQUIRED TO SET FORTH LEGAL THEORIES OR ARGUMENTS.

## History

The plaintiff (Randell Orange) at a young age put golds/ crowns on his front teeth because he was born with a gap and teeth spacing. Before the procedures the Dentist had to put Banneas/ False teeth on his Incisors front teeth to close the gap. The plaintiff have teeth on top of his real born natural teeth. Then the Dentist put crowns/ golds on his teeth. All this costed Thousands of dollars to have a normal perfect smile.

When the plaintiff eat or drink anything he put the crowns in his teeth to block those substance from getting under the False teeth that's cemented, concrete, glued on top of his natural real teeth. Anything get under them affects



### V. Relief

State exactly what you want the court to provide you or do for you. Make no legal arguments. Cite no cases or statutes.

\$ 100,000 For my pain and suffering and All the medical treatment and procedures I had to go through. for this officer violating my constitutional rights and the Rules for taking my Gold/crowns home selling them and they was to protect my teeth, gums, health. For All the medicine I had to intake, couldn't eat for months. Drinking straight liquid. All the weight I lost.

### VI. Plaintiff's Declaration COMPENSATORY, Punitive DAMAGES Court Fee's

A. I declare under penalty of perjury that all of the facts represented in this complaint and any attachments hereto is true and correct.

the root of the teeth, It affects the gums, Also the Cementum Blood Vessels/Nerves that send painful shocks for minutes/Hours of pain. Where the plaintiff have to take several pain pills to relieve the pain. All of this is in the plaintiff MEDICAL RECORD.

### FACTS about the Case, Involvement And Actions of each Defendant

Its CAMERAS on each tier at Allen Correctional Center. Captain Terry Lavey Investigator officer have those cameras on file on a DVR disc with all the officers statements.

5 officers came in my cell - Lt. Castillo, Sgt. Cook, Sgt. Russell, Lt. Lay Jay, Sgt. Window and took my Gold Teeth/Crowns and 6 expensive magazines.

I explained to them my Gold Teeth/Crowns was to block food and liquid/Fluids to protect food partials from getting under the expensive false teeth that's cemented on top of my real teeth. If anything get under there and rot, decompose, decay because I can't clean them or get it without a dentist surgery/surgeon ~~procedure~~, it causes a infection.

Lt. Castillo was the supervisor doing the time. And I told him to call medical, its in my file. He said, "He was going to give them to Captain Wise who

over the block. When I came in from work, I went to Captain Wise and he said, "Lt. Castillo the night shift didn't leave him nothing. He told me to do my paper work because he wasn't responsible for a officer unprofessional duty."

After the investigation, I found out Lt. Castillo took my Gold/teeth, crowns home and sold them. All officers filed there statements and the camera is in the folder on a disc.

They layed him off because of that and some other bad activity, violating he was doing.

I filed all ARP's giving the people a chance to correct there officer violation.

I Been in pain and suffering due to I can't block food or liquids from getting under my teeth. Recently I found out by the medical staff that I had a infection because food was under my false teeth that's on top of my real teeth, because I can't block food or liquids from getting under there because the officer took my crowns/gold teeth home and sold them.

I Had to go thru 5 dental procedures since the officer took my crowns for my teeth. I had

→ AIR suction to suck all the old food from under my false teeth that's on top of my real teeth. Then I had to have 4 shots in my gums to kill the nerves from the pain. Serious Pain and suffering.

→ Recently, I had to be put on antibiotics for the infections and 550mg's naproxens super big pills 2x twice a day. In the morning and evening to limit my suffering. All medical slips and bills I had to pay is attached. →

( Due to the evidence and statements and cameras and the officers violation I'm entitled relief under the 8th Amendment, Cruel and Unusual Punishment / Pain and Suffering. )

### 8th Amendment, Cruel and Unusual Punishment

The 8th Amendment, which forbids "cruel and unusual punishments. To win an 8th Amendment case, I must establish both an "objective component," the seriousness of the challenged conditions, and a "subjective component," the state of mind of the officials who are responsible for them. See Farmer v. Brennan, 511 U.S. 825, 834, 114 S. Ct. 1970 (1994)

I stated the above in my complaint. THANK YOU FOR YOUR understanding and service.

- B. I understand that if I am transferred or released, I must apprise the Court of my address, and my failure to do so may result in this complaint being dismissed.
- C. I understand that I may not proceed without prepayment of cost if I have filed three lawsuits and/or appeals that were dismissed on grounds that the action and/or appeal was frivolous or malicious, or failed to state a claim upon which relief may be granted, unless I am in imminent danger of serious physical injury.

Signed this 19 day of MARCH, 2014.

447630

Prisoner no. (Louisiana Department of  
Corrections or Federal Bureau of Prisons)

Randall Orange

Signature of Plaintiff

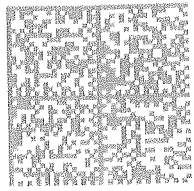
5/97

Mr. Randall Orange #447630  
670 Bell Hill Rd  
Homer, LA 71040

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TONY R. MOORE, CLERK  
WESTERN DISTRICT OF LOUISIANA  
BY SHREVEPORT, LA



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